

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	12-MC-0115 (JSR)
In re: MADOFF SECURITIES	

NOTICE OF ANTECEDENT DEBT DEFENDANTS' MOTION TO DISMISS

PLEASE TAKE NOTICE THAT the Antecedent Debt Defendants (as defined by the Court's Order, *In re Madoff Sec.*, No. 12-mc-0115 (JSR), (S.D.N.Y. May 12, 2012), ECF No. 107 (the "Antecedent Debt Order")), will move before the Honorable Jed S. Rakoff, United States District Judge, on August 20, 2012, at 4:00 p.m., in Courtroom 14-B at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order pursuant to Rule 12 of the Federal Rules of Civil Procedure (made applicable to the adversary proceeding by Fed. R. Bankr. P. 7012(b)). The Antecedent Debt Defendants seek dismissal of the complaints against them in whole or part as to any challenged transfers or portions thereof that cannot be avoided because they were taken for value, including in satisfaction of antecedent debts, or are otherwise shielded from recovery.

The motion is based upon the accompanying Consolidated Memorandum of Law on Behalf of Antecedent Debt Defendants, the briefing and supporting materials incorporated therein, all pleadings and papers filed in these proceedings, and any other matters that may properly come before the Court.

Pursuant to the Antecedent Debt Order, responsive papers, if any, must be filed and served on or before July 25, 2012, and reply papers, if any, must be filed and served on or before August 8, 2012.

Dated: June 25, 2012

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